

To: anna.weber@cadmusgroup.com[anna.weber@cadmusgroup.com]
Cc: Shari.Ring@cadmusgroup.com[Shari.Ring@cadmusgroup.com]; Dermer, Michele[Dermer.Michele@epa.gov]
From: McWhirter, Lisa
Sent: Fri 12/11/2015 5:05:02 PM
Subject: FW: Tentative Alon aquifer exemption meeting
Comments ALON Aquifer Exemption App_DLW.docx

Hi Anna,

Please accept this email as technical direction to review the attached document from the CA Water Board (see message below) and provide feedback to Michele Dermer and cc me on 1) whether you agree with the Water Board's comments and 2) if the Water Board altered any of our comments.

We can discuss this further on the call today.

Thanks,

Lisa

From: Dermer, Michele
Sent: Thursday, December 10, 2015 4:53 PM
To: McWhirter, Lisa <McWhirter.Lisa@epa.gov>
Cc: Albright, David <Albright.David@epa.gov>
Subject: FW: Tentative Alon aquifer exemption meeting

Lisa, I would like to send this to Anna to get her feedback on 1) whether or not she agrees with the comments and 2) if they alter any of ours. I need it before the meeting next Wednesday, should not take her more than a couple of hours.

Thanks, Michele

From: Harvey, Dale@Waterboards [<mailto:Dale.Harvey@waterboards.ca.gov>]
Sent: Thursday, December 10, 2015 4:29 PM
To: Dermer, Michele <Dermer.Michele@epa.gov>
Cc: Cregan, Alan@Waterboards <Alan.Cregan@waterboards.ca.gov>; Rodgers, Clay@Waterboards <Clay.Rodgers@waterboards.ca.gov>
Subject: RE: Tentative Alon aquifer exemption meeting

Hi Michele. Attached are some informal comments that our staff put together. Additionally, we have heard rumor that the reason Alon wants the exemption is because it intends to ramp-up operations and does not have the needed capacity. In addition to the attached comments regarding the AE application, we are also concerned that the existing injection project that we permitted was based on a specific design life of 20 years, which is long past. We do not know how far the plume associated with this injection has gone. I hope to bring this issue up at the meeting.